

## **EXHIBIT A**



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October 7, 2022

Ms. Jennifer Ashley  
 Attorney at Law  
 Salvi, Schostok & Pritchard, P.C.  
 161 North Clark Street  
 Suite 4700  
 Chicago, IL 60601

RE: Deanna Murphy

Dear Ms. Ashley:

The attached Medical Care Cost Summary reveals that the monies needed by Deanna Murphy for future health and medical care are stated in a range of \$2,095,586 to \$2,230,595 using a Spinal Cord Stimulator without lead replacement and in a range of \$2,215,541 to \$2,350,550 using a Spinal Cord Stimulator with lead replacement. The figures are stated in terms of present value, based upon the range of treatment options and treatment costs of the underlying life care plan prepared by Gary M. Yarkony, MD on March 31, 2021, his Life Care Plan Addendum prepared on October 27, 2021, his March 2, 2022 deposition testimony and his Life Care Plan Addendum prepared on September 27, 2022. These figures consider appropriate rates of interest and medical care increases in the areas of commodities and services.

The present value of Deanna Murphy's future health and medical care costs broken out by Dr. Yarkony's categories is shown in Figure 1.

**Figure 1 - Present Value of Medical Costs by Cost Category**

Cost Category	Present Value of Medical Costs	
	SCS without lead replacement	SCS with lead replacement
Medications	\$880,836	
Therapy	\$40,250	
Trigger Point Injections	\$36,518 to \$73,035	
Botox Injections	\$351,966	
Additional Medical Care	\$46,499 to \$61,999	
Assistance at Home	\$304,304 to \$387,296	
Spinal Cord Stimulator	\$435,213	\$555,168
<b>Total Cost</b>	<b>\$2,095,586 to \$2,230,595</b>	<b>\$2,215,541 to \$2,350,550</b>

Table 1 examines the interrelationship over time between the rate of medical cost changes and the rate of interest. An inspection of the table reveals fluctuation over time. However, the real rates remain relatively constant. Our present value calculation based on historical 60-year average assumes that similar trends will persist in the future.

Please advise if further information is desired.

Sincerely,  
VOCATIONAL ECONOMICS, INC.

For the Firm



David S. Gibson, MBA, MRC

/mg

Table 1

Source	Indices	Nominal or Real*	1961-2021	1971-2021	1981-2021	1991-2021	2001-2021	2011-2021
1a	All Items	Nom Real	3.7% -	3.9% -	2.8% -	2.3% -	2.1% -	1.9% -
1b	Medical Services	Nom Real	5.7% 1.9%	5.8% 1.8%	5.0% 2.1%	4.0% 1.7%	3.7% 1.6%	3.1% 1.2%
1c	Hospital & Related	Nom Real	7.4% 3.6%	7.4% 3.4%	6.4% 3.5%	5.4% 3.0%	5.3% 3.1%	4.0% 2.1%
1d	Commodities	Nom Real	3.6% -0.1%	4.2% 0.3%	3.8% 1.0%	2.6% 0.3%	2.1% 0.0%	1.5% -0.4%
1e	Professional Svcs.	Nom Real	4.8% 1.1%	4.8% 0.9%	3.9% 1.1%	3.0% 0.7%	2.5% 0.4%	1.8% -0.1%
2	Compensation	Nom Real	5.0% 1.3%	4.8% 0.9%	3.9% 1.1%	3.5% 1.2%	3.2% 1.1%	3.4% 1.5%
3	Interest	Nom Real	4.5% 0.8%	4.5% 0.6%	3.7% 0.9%	2.3% 0.0%	1.2% -0.9%	0.6% -1.3%

1 U.S. Bureau of Labor Statistics. 2021. Consumer Price Index, All Urban Consumers (CPI-U), U.S. City Average. Accessed February 2022. <http://data.bls.gov/cgi-bin/srgate>.

1a Use Series CUUR0000SA0.

1b Use Series CUUR0000SAM2.

1c Use Series CUUR0000SEMD. The Hospital Services index was first published in 1978. Prior years are imputed by the long-term relationship between Hospital Services and Medical Services.

1d Use Series CUUR0000SAM1.

1e Use Series CUUR0000SEMC. The Professional Services index was first published in 1967. Prior years are imputed by the long-term relationship between Professional Services and Physician Services.

2 U. S. Bureau of Labor Statistics. 2021. Major Sector Productivity and Costs Index: Business Sector, Hourly Compensation. Accessed February 2022. <http://data.bls.gov/cgi-bin/srgate> (use Series ID #: PRS84006103).

3 Federal Reserve Bank. 2021. 3-Month Treasury Bill Secondary Market Rate Discount Basis. Accessed February 2022. <https://www.federalreserve.gov/datadownload/Choose.aspx?rel=H15>.

\* Nominal rates represent the geometric mean of the change in indices from the beginning to the end of the respective periods. Real rates remove the general rate of inflation (All Items) from the nominal values.

**Life Care Plan for: Deanna Murphy****Attorney: Jennifer Ashley****Planner: Gary Yarkony**

Rate	Anal	Duration	Yrs.	Frequency	Annual Cost	Current Cost	Present Value																																		
Present Age: 58 Life Expectancy: 26.6* Age of Death: 84.6																																									
<b>Rates Used (Real)</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Type</th><th>Abbr</th><th>Grow.</th><th>Disc.</th><th>Net.</th></tr> </thead> <tbody> <tr> <td>General Inflation</td><td>CPI</td><td>0.0%</td><td>0.8%</td><td>0.80% Disc</td></tr> <tr> <td>Medical Services</td><td>MS</td><td>1.9%</td><td>0.8%</td><td>1.09% Grow</td></tr> <tr> <td>Hospital Services</td><td>HS</td><td>3.6%</td><td>0.8%</td><td>2.78% Grow</td></tr> <tr> <td>Medical Commodities</td><td>MC</td><td>-0.1%</td><td>0.8%</td><td>0.90% Disc</td></tr> <tr> <td>Professional Services</td><td>PRSV</td><td>0.8%</td><td>0.8%</td><td>0.00% Disc</td></tr> <tr> <td>Compensation</td><td>CMP</td><td>0.8%</td><td>0.8%</td><td>0.00% Disc</td></tr> </tbody> </table>							Type	Abbr	Grow.	Disc.	Net.	General Inflation	CPI	0.0%	0.8%	0.80% Disc	Medical Services	MS	1.9%	0.8%	1.09% Grow	Hospital Services	HS	3.6%	0.8%	2.78% Grow	Medical Commodities	MC	-0.1%	0.8%	0.90% Disc	Professional Services	PRSV	0.8%	0.8%	0.00% Disc	Compensation	CMP	0.8%	0.8%	0.00% Disc
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<b>Analyses Included</b> <ul style="list-style-type: none"> <li>1 SCS - Procedure without lead replacement</li> <li>2 SCS - Procedure with lead replacement</li> </ul>																																									

\* Arias, Elizabeth and Jiaquan Xu. National Vital Statistics Reports, vol. 70 no. 19, United States Life Tables, 2019. National Center for Health Statistics, U.S. Center for Disease Control and Prevention, Hyattsville, MD, 2022. <https://www.cdc.gov/nchs/data/nvsr/nvsr70/nvsr70-19.pdf> (accessed April 2022).

**Life Care Plan for: Deanna Murphy****Attorney: Jennifer Ashley****Planner: Gary Yarkony**

	Rate	Anal	Duration	Yrs.	Frequency	Annual Cost	Current Cost	Present Value
<b>Medications</b>								
Vyepti infusions	MC	All	Now to Life Expectancy	26.6	Annually	\$25,660.00	\$682,556	\$604,597
Ubrelvy 50 mg	MC	All	Now to Life Expectancy	26.6	Monthly	\$11,100.00	\$295,260	\$261,537
Cyclobenzaprine 10mg	MC	All	Now to Life Expectancy	26.6	Monthly	\$360.00	\$9,576	\$8,482
Duloxetine 20mg	MC	All	Now to Life Expectancy	26.6	Monthly	\$120.00	\$3,192	\$2,827
Ibuprofen 600mg	MC	All	Now to Life Expectancy	26.6	Monthly	\$144.00	\$3,830	\$3,393

**Medications Totals****Analysis: All Analyses**

Medical Commodities (0.90% Disc)      \$994,414      \$880,836

**Life Care Plan for: Deanna Murphy****Attorney: Jennifer Ashley****Planner: Gary Yarkony**

	Rate	Anal	Duration	Yrs.	Frequency	Annual Cost	Current Cost	Present Value
<b>Therapy</b>								
Vision	PRSV	All	Now to Life Expectancy	26.6	50 Total Times During Span	\$216.17	\$5,750	\$5,750
Vestibular	PRSV	All	Now to Life Expectancy	26.6	50 Total Times During Span	\$535.71	\$14,250	\$14,250
Physical Therapy	PRSV	All	Now to Life Expectancy	26.6	50 Total Times During Span	\$761.28	\$20,250	\$20,250
<b>Therapy Totals</b>								
<b>Analysis: All Analyses</b>						Professional Services (0.00% Disc)	\$40,250	\$40,250

**Life Care Plan for: Deanna Murphy****Attorney: Jennifer Ashley****Planner: Gary Yarkony**

	Rate	Anal	Duration	Yrs.	Frequency	Annual Cost	Current Cost	Present Value
<b><i>Trigger Point Injections</i></b>								
Injection	MS	All	Now to Life Expectancy	26.6	Annually	\$1,178.00 to \$2,356.00	\$31,335 to \$62,670	\$36,518 to \$73,035

## **Life Care Plan for: Deanna Murphy**

Attorney: Jennifer Ashley

Planner: Gary Yarkony

	Rate	Anal	Duration	Yrs.	Frequency	Annual Cost	Current Cost	Present Value
<b>Botox Injections</b>								
Injection	MS	All	Now to Life Expectancy	26.6	Annually	\$4,492.00	\$119,487	\$139,250
Botox 150 units	MC	All	Now to Life Expectancy	26.6	Annually	\$9,028.00	\$240,145	\$212,716

**Life Care Plan for: Deanna Murphy****Attorney: Jennifer Ashley****Planner: Gary Yarkony**

	Rate	Anal	Duration	Yrs.	Frequency	Annual Cost	Current Cost	Present Value
<b><i>Additional Medical Care</i></b>								
Neuro, Pain Mgmt, Labs and Imaging	MS	All	Now to Life Expectancy	26.6	Annually	\$1,500.00 to \$2,000.00	\$39,900 to \$53,200	\$46,499 to \$61,999

**Life Care Plan for: Deanna Murphy****Attorney: Jennifer Ashley****Planner: Gary Yarkony**

	Rate	Anal	Duration	Yrs.	Frequency	Annual Cost	Current Cost	Present Value
<b>Assistance at Home</b>								
Caregiver	CMP	All	Now to Life Expectancy	26.6	Weekly	\$11,440.00 to \$14,560.00	\$304,304 to \$387,296	\$304,304 to \$387,296

**Life Care Plan for: Deanna Murphy****Attorney: Jennifer Ashley****Planner: Gary Yarkony**

	Rate	Anal	Duration	Yrs.	Frequency	Annual Cost	Current Cost	Present Value
<b>SCS - w/out lead replacement</b>								
Facility Insert Generator	MS	1	Now to Life Expectancy	26.6	3 Total Times During Span	\$6,766.92	\$180,000	\$209,772
Generator	MC	1	Now to Life Expectancy	26.6	3 Total Times During Span	\$6,766.92	\$180,000	\$159,441
Surgeon/Anesthesia	PRSV	1	Now to Life Expectancy	26.6	3 Total Times During Span	\$2,481.20	\$66,000	\$66,000

**SCS - w/out lead replacement Totals****Analysis: SCS - Procedure without lead replacement**

Medical Commodities (0.90% Disc)	\$180,000	\$159,441
Medical Services (1.09% Grow)	\$180,000	\$209,772
Professional Services (0.00% Disc)	\$66,000	\$66,000
	<b>\$426,000</b>	<b>\$435,213</b>

**Life Care Plan for: Deanna Murphy****Attorney: Jennifer Ashley****Planner: Gary Yarkony**

	Rate	Anal	Duration	Yrs.	Frequency	Annual Cost	Current Cost	Present Value
<b>SCS - with lead replacement</b>								
Facility Insert Generator	MS	2	Now to Life Expectancy	26.6	3 Total Times During Span	\$6,766.92	\$180,000	\$209,772
Generator	MC	2	Now to Life Expectancy	26.6	3 Total Times During Span	\$6,766.92	\$180,000	\$159,441
Insert Leads	MS	2	Now to Life Expectancy	26.6	3 Total Times During Span	\$3,655.26	\$97,230	\$113,312
Leads	MC	2	Now to Life Expectancy	26.6	3 Total Times During Span	\$281.95	\$7,500	\$6,643
Surgeon/Anesthesia	PRSV	2	Now to Life Expectancy	26.6	3 Total Times During Span	\$2,481.20	\$66,000	\$66,000
<b>SCS - with lead replacement Totals</b>								
Analysis: SCS - Procedure with lead replacement								
						Medical Commodities (0.90% Disc)	\$187,500	\$166,084
						Medical Services (1.09% Grow)	\$277,230	\$323,084
						Professional Services (0.00% Disc)	\$66,000	\$66,000
							<b>\$530,730</b>	<b>\$555,168</b>

**Life Care Plan for: Deanna Murphy****Attorney: Jennifer Ashley****Planner: Gary Yarkony**

Rate	Anal	Duration	Yrs.	Frequency	Annual Cost	Current Cost	Present Value
<b><i>Analysis Totals</i></b>							
<b>Analysis: SCS - Procedure without lead replacement</b>							
					Compensation (0.00% Disc) \$304,304 to \$387,296	\$304,304 to \$387,296	
					Medical Commodities (0.90% Disc) \$1,414,559	\$1,252,993	
					Medical Services (1.09% Grow) \$370,722 to \$415,357	\$432,039 to \$484,056	
					Professional Services (0.00% Disc) \$106,250	\$106,250	
					<b>Grand Total</b>	<b>\$2,195,835 to \$2,323,462</b>	<b>\$2,095,586 to \$2,230,595</b>
<b>Analysis: SCS - Procedure with lead replacement</b>							
					Compensation (0.00% Disc) \$304,304 to \$387,296	\$304,304 to \$387,296	
					Medical Commodities (0.90% Disc) \$1,422,059	\$1,259,636	
					Medical Services (1.09% Grow) \$467,952 to \$512,587	\$545,351 to \$597,368	
					Professional Services (0.00% Disc) \$106,250	\$106,250	
					<b>Grand Total</b>	<b>\$2,300,565 to \$2,428,192</b>	<b>\$2,215,541 to \$2,350,550</b>